

**THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

SMARTMATIC USA CORP.,	)	
SMARTMATIC	)	
INTERNATIONAL HOLDING B.V. and	)	
SGO CORPORATION LIMITED,	)	
	)	
Plaintiffs,	)	Case No. 22-cv-00098-WMW-JFD
	)	
v.	)	
	)	
MICHAEL J. LINDELL and MY PILLOW,	)	
INC.,	)	
	)	
Defendants.		

---

**THIRD DECLARATION OF CHRISTOPHER I. KACHOUROFF  
IN SUPPORT OF DEFENDANTS' MOTION FOR SUMMARY  
JUDGMENT**

---

I, Christopher I. Kachoureff, hereby declare the following:

1. My name is Christopher I. Kachoureff, and I am an attorney admitted in this case *pro hac vice* representing the Defendants Michael Lindell and My Pillow, Inc. in the above-captioned action.
2. Attached as Defendants' Appendix 1 is a non-exhaustive chart of damages and injuries Plaintiffs publicly claimed they suffered on February 4, 2021—prior to Lindell making any statement at issue in the above-captioned case.

3. Attached as Defendants' Exhibit P is a true and accurate copy of the Plaintiffs' lawsuit against Fox News and several other individuals that was filed in New York on February 4, 2021.

4. Attached are two unpublished cases referenced in Defendants' Reply Brief in Support of Defendants' Motion for Summary Judgment:

- *Ferrari v. Best Buy Co.*, 2015 WL 2242128 (D. Minn. May 12, 2015).
- *Insulate SB, Inc. v. Advanced Finishing Systems, Inc.*, 2014 WL 943224 (D. Minn. Mar. 11, 2014); *affirmed* 797 F.3d 538 (2015).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 27, 2024.

/s/ Christopher I. Kachouroff  
Christopher I. Kachouroff\* (Bar No. 44216)  
**MCSWEENEY, CYNKAR & KACHOUROFF, PLLC**  
13649 Office Place, Suite 101  
Woodbridge, Virginia 22192  
Telephone: (703) 621-3300  
[chris@mck-lawyers.com](mailto:chris@mck-lawyers.com)

*\*Admitted Pro Hac Vice*